

BENJAMIN B. WAGNER  
United States Attorney  
PHILIP FERRARI  
Assistant U.S. Attorney  
501 I Street, Suite 10-100  
Sacramento, California 95814  
Telephone: (916) 554-2700

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. CR S 10-0223 JAM
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
HODA SAMUEL,	)	STIPULATION AND
CONNIE DEVERS,	)	ORDER FOR CONTINUANCE OF
CHARLES ROBERT MANESS,	)	STATUS CONFERENCE
DANA FAULKNER,	)	
TRACY PAINTER,	)	
YGNACIA BRADFORD,	)	
SEAN PATRICK GJERDE,	)	
NICOLE DAWSON,	)	
DANIEL HARRISON, and	)	Date: September 14, 2010
RONALD BURRIS, JR.,	)	Time: 9:30 a.m.
	)	Hon. John A. Mendez
Defendants.	)	
_____	)	

It is hereby stipulated and agreed to between the United States of America through PHILIP A. FERRARI, Assistant United States Attorney, and defendants HODA SAMUEL, CONNIE DEVERS, CHARLES ROBERT MANESS, DANA FAULKNER, TRACY PAINTER, YGNACIA BRADFORD, SEAN PATRICK GJERDE, NICOLE DAWSON, DANIEL HARRISON, and RONALD BURRIS, JR., by and through their respective counsel, that the status conference in the above-captioned matter set for Tuesday, August 3, 2010, be

continued to Tuesday, September 14, 2010, at 9:30 a.m.

The parties request that the Court exclude from calculation under the Speedy Trial Act the time from the date of the originally set status conference, August 3, 2010, through the date of the status conference set for September 14, 2010, pursuant to 18 U.S.C. §§ 3161(h)(7)(B)(ii) and (iv) [complexity and reasonable time to prepare] (Local Codes T2 and T4). Since the Indictment was filed on June 10, 2010, the government has produced over 34,000 documents to counsel for the defendants. The parties stipulate that the ends of justice are served by the Court excluding such time, so that each defense counsel may have reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). Specifically, each defendant agrees that his or her counsel needs time to review the discovery, investigate the facts underlying this case and seek possible resolution. Additionally, the parties stipulate that the above-captioned case is unusual and complex such that it is unreasonable to expect adequate preparation for pretrial proceedings, or for a potential trial within the time limits established by the Speedy Trial Act.

IT IS SO STIPULATED.

DATE: July 29, 2010 By: /s/ Philip A. Ferrari  
PHILIP A. FERRARI  
Assistant U.S. Attorney

DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
SCOTT TEDMON  
Counsel for Defendant  
HODA SAMUEL

1 DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
2 MARK REICHEL  
3 Counsel for Defendant  
4 CONNIE DEVERS

5 DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
6 DONALD HELLER  
7 Counsel for Defendant  
8 CHARLES ROBERT MANESS

9 DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
10 THOMAS JOHNSON  
11 Counsel for Defendant  
12 SEAN GJERDE

13 DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
14 MICHAEL PETRIK, JR.  
15 Counsel for Defendant  
16 TRACY PAINTER

17 DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
18 CHRISTOPHER HAYDN-MYER  
19 Counsel for Defendant  
20 DANIEL HARRISON

21 DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
22 ADANTE DE POINTER  
23 Counsel for Defendant  
24 DANA FAULKNER

25 DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
26 MICHAEL BIGELOW  
27 Counsel for Defendant  
28 NICOLE DAWSON

DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
JOSEPH J. WISEMAN  
Counsel for Defendant  
YGNACIA BRADFORD

DATE: July 29, 2010 By: /s/ Philip A. Ferrari for  
MICHAEL E. HANSEN  
Counsel for Defendant  
RONALD BURRIS, JR.

IT IS SO FOUND AND ORDERED.

DATED: July 29, 2010 /s/ John A. Mendez  
HON. JOHN A. MENDEZ  
UNITED STATES DISTRICT JUDGE